



Air Pollution Control District  
San Luis Obispo County



July 28, 2016

Ms. Kate Shea  
San Luis Obispo County Department of Planning and Building  
County Government Center  
San Luis Obispo ca 93401

SUBJECT: APCD comments regarding the groundwater extraction and treatment facility - Turri Road, Los Osos (DRC2015-00129)

Dear Ms. Shea,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed project located at 2275 Turri Road in Los Osos. The project includes a proposed minor use permit to install 10 new groundwater extraction wells and an approximately 300 sq. ft treatment facility.

*The following are APCD comments that are pertinent to this project:*

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text.**

**Construction Phase Impacts**

The APCD evaluated the construction phase impacts of this project and found that they will likely be less than the APCD's significance threshold values identified in Table 2-1 of the CEQA Air Quality Handbook (available at the APCD web site: [slocleanair.org](http://slocleanair.org)). **Therefore, with the exception of the requirements below, the APCD is not requiring other construction phase mitigation measures for this project.**

Naturally Occurring Asbestos

If any grading will occur, then requirements related to naturally occurring asbestos may be applicable. Naturally occurring asbestos (NOA) has been identified by the California Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. The SLO County APCD has identified areas throughout the county where NOA may be present (see the APCD's 2012 CEQA Handbook, Technical Appendix 4.4).

Project Referral for Groundwater extraction and treatment facility - Turri Road Los Osos

July 28, 2016

Page 2 of 2

If the project site is located in a candidate area for Naturally Occurring Asbestos (NOA), the following requirements apply. Under the CARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (93105), **prior to any construction activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if the area disturbed is exempt from the regulation. An exemption request must be filed with the APCD.** If the site is not exempt from the requirements of the regulation, the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. More information on NOA can be found at [slocleanair.org/business/asbestos.php](http://slocleanair.org/business/asbestos.php).

### **Operation Phase Impacts**

#### **Operational Permit Requirements**

The groundwater treatment facility may require an APCD permit. Other equipment that could also require a permit include the following:

- Portable generators and equipment with engines that are 50 hp or greater; and
- Standby generator.

Most facilities applying for an Authority to Construct or Permit to Operate with stationary diesel engines greater than 50 hp, should be prioritized or screened for facility wide health risk impacts. A diesel engine-only facility limited to 20 non-emergency operating hours per year or that has demonstrated to have overall diesel particulate emissions less than or equal to 2 lb/yr does not need to do an additional health risk assessment. **To minimize potential delays, prior to the start of the project, please contact the APCD Engineering & Compliance Division at (805) 781-5912 for specific information regarding permitting requirements.**

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at (805) 781-4667.

Sincerely,



Melissa Guise

Air Quality Specialist

MAG/ihs

cc: Keith Miller, San Luis Obispo County Public Works Department  
Tim Fuhs, Enforcement Division, APCD  
Dora Drexler, Enforcement Division, APCD  
Gary Willey, Engineering Division, APCD

#### **Attachments:**

1. Naturally Occurring Asbestos – Construction & Grading Project Exemption Request Form
2. Construction & Grading Project Form

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Air Pollution Control District  
San Luis Obispo County

3433 Roberto Court, San Luis Obispo, CA 93401  
805-781-5912 – FAX: 805-781-1002

## Naturally Occurring Asbestos Construction & Grading Project Exemption Request Form

<b>Applicant Information/ Property Owner</b>		<b>Project Name</b>	
<b>Address</b>		<b>Project Address</b>	
<b>City, State, Zip</b>		<b>City, State, Zip</b>	
<b>Email Address</b>		<b>Project Site Latitude, Longitude</b>	<b>Assessors Parcel Number</b>
<b>Phone Number</b>	<b>Date Submitted</b>	<b>Agent</b>	<b>Phone Number</b>

The District may provide an exemption from Section 93105 of the California Code of Regulations - Asbestos Airborne Toxic Control Measure For Construction, Grading, Quarrying, And Surface Mining Operations for any property that has any portion of the area to be disturbed located in a geographic ultramafic rock unit; if a registered geologist has conducted a geologic evaluation of the property and determined that no serpentine or ultramafic rock is likely to be found in the area to be disturbed. Before an exemption can be granted, the owner/operator must provide a copy of a report detailing the geologic evaluation to the District for consideration. The District will approve or deny the exemption within 90 days. An outline of the required geological evaluation is provided in the District handout **"ASBESTOS AIRBORNE TOXIC CONTROL MEASURES FOR CONSTRUCTION, GRADING, QUARRYING, AND SURFACE MINING OPERATIONS – Geological Evaluation Requirements."** See the APCD Website map: [slocleanair.org/rules-regulations/asbestos/noa.php](http://slocleanair.org/rules-regulations/asbestos/noa.php)

**NOTE: A basic exemption evaluation fee of \$187.50 will be charged.**

### APPLICANT MUST SIGN BELOW:

*I request the San Luis Obispo County Air Pollution Control District grant this project exemption from the requirements of the ATCM based on the attached geological evaluation.*

\_\_\_\_\_  
Legal Declaration/Authorized Signature

\_\_\_\_\_  
Date:

### OFFICE USE ONLY - APCD Required Element – Geological Evaluation

Date Received:	Date Reviewed:	OIS Site #:	OIS Project #:
	APCD Staff:	Approved	Not Approved

Comments:

# XOLON SALINAN TRIBE

## "PEOPLE OF THE OAKS"

*The Xolon Salinan Tribe are the People who have been referred to as the Salinan Indians from Missions San Miguel, San Antonio and Soledad. We have always called ourselves "Xolon Indians." The Federal government called us the "Salinans," because of the Salinas River that runs through most of our ancient territory; hence, we now call ourselves "The Xolon Salinan Tribe," so that everyone will know who we are. Our ancient People lived (documented) along the Central Coast of California, from the northern part of San Luis Obispo – to the Big Sur area to the north – and inland to the Temblor Range. There have been erroneous writings, regarding Natives observed living along the coast, claiming that this area was inhabited by Indians called the "Playanos." This is incorrect. It was the Salinan People – our families – who would go there on a seasonal basis to fish and collect shells for regalia and trade.*

June 17, 2016

Re: **Consultation for SLO Plan & Build DRC2015-00129 Piccuta, MUP, Los Osos CA. APN 067-011-047**

Good Day Kate,

Based on information provided and reviewed, this area falls within the gray area of our traditional affiliation boundaries.

We have some speculation Los Osos was a thoroughfare/pathway for the Salinan & Chumash People. Mainly for gathering shells for regalia and fishing needs.

At this time we do not know of any sensitive areas within this land.

*Best Regards,  
Karen R. White, Council Chair  
Xolon Salinan Tribe  
831.238.1488*



P.O. Box 7045,  
Spreckels, Ca. 93962

Karen R. White  
Council Chair  
[blukat41@yahoo.com](mailto:blukat41@yahoo.com)

Robert Sims  
Council Vice Chair  
[ziggyorjoyce@yahoo.com](mailto:ziggyorjoyce@yahoo.com)

Thomas Ball  
Council Secretary –  
MLD/Monitor Coordinator  
[Tom101999@yahoo.com](mailto:Tom101999@yahoo.com)

George Larson  
Council Treasurer  
[smalltownfolks@sbcglobal.net](mailto:smalltownfolks@sbcglobal.net)

### Council Members:

Linda Castle - elder  
Selena Castle  
Blaise Haro

### Tribal Headwoman

Donna Haro – elder  
"AAKLETSE"  
[xolonaakletse@aol.com](mailto:xolonaakletse@aol.com)





**Los Osos Community Advisory Council**

July 1, 2016

Los Osos Community Advisory Council Comments on *DRC2015-00129 PICCUTA MUP* proposed construction of a ten (10) new extraction wells and treatment facility.

To: Ms. Kate Shea, Planner, Planning & Building  
Mr. Keith Miller, Director, Public Works

On June 23, 2016 the LOCAC members met and reviewed DRC2015-00129 and recommended approval of the requested minor use permit with no concerns expressed.

Thank you for your attention to our request.

Sincerely,

Jeffrey H. Weir/s

Chairperson  
Los Osos Community Advisory Council

Cc: Bruce Gibson, Supervisor



SAN LUIS OBISPO COUNTY

## DEPARTMENT OF PLANNING AND BUILDING

Promoting the wise use of land - Helping to build great communities

### THIS IS A NEW PROJECT REFERRAL

DATE: 5/25/2016

TO: \_\_\_\_\_

FROM: Kate Shea (805-781-4163 or kshea@co.slo.ca.us)  
Coastal Team / Development Review

**PROJECT DESCRIPTION:** DRC2015-00129 PICCUTA – Proposed minor use permit to install 10 new groundwater extraction wells and approximately 300 SF treatment facility. Project location is 2275 Turri Road, Los Osos. APN: 067-011-047

Return this letter with your comments attached no later than 14 days from receipt of this referral. CACs please respond within 60 days. Thank you.

**PART 1 - IS THE ATTACHED INFORMATION ADEQUATE TO COMPLETE YOUR REVIEW?**

- ☒ YES (Please go on to PART II.)  
☐ NO (Call me ASAP to discuss what else you need. We have only 10 days in which we must obtain comments from outside agencies.)

**PART II - ARE THERE SIGNIFICANT CONCERNS, PROBLEMS OR IMPACTS IN YOUR AREA OF REVIEW?**

- ☐ YES (Please describe impacts, along with recommended mitigation measures to reduce the impacts to less-than-significant levels, and attach to this letter.)  
☒ NO (Please go on to PART III.)

**PART III - INDICATE YOUR RECOMMENDATION FOR FINAL ACTION.**

Please attach any conditions of approval you recommend to be incorporated into the project's approval, or state reasons for recommending denial.

IF YOU HAVE "NO COMMENT," PLEASE SO INDICATE, OR CALL.

NO CONCERNS

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

8/12/16  
Date

LYNDA AUCHINCLOSS  
Name

5914  
Phone





*Glu*  
SAN LUIS OBISPO COUNTY

## DEPARTMENT OF PLANNING AND BUILDING

Promoting the wise use of land - Helping to build great communities

### THIS IS A NEW PROJECT REFERRAL

DATE: 5/25/2016

FR TO: PW

TO FROM: Kate Shea (805-781-4163 or kshea@co.slo.ca.us)  
Coastal Team / Development Review

RECEIVED

MAY 25 2016

COUNTY OF SAN LUIS OBISPO  
DEPARTMENT OF PUBLIC WORKS

**PROJECT DESCRIPTION:** DRC2015-00129 PICCUTA – Proposed minor use permit to install 10 new groundwater extraction wells and approximately 300 SF treatment facility. Project location is 2275 Turri Road, Los Osos. APN: 067-011-047

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IF YOU HAVE "NO COMMENT," PLEASE SO INDICATE, OR CALL.

NO COMMENTS OR CONCERNS. MONITORING NOT NEEDED  
PER B.A.O. 065, SEE ATTACHED EMAIL.

6-7-16  
Date

*[Signature]*  
Name

5271  
Phone

6/7/2016

DRC2015-00129 - Well Conditions review - Tim Tomlinson

## DRC2015-00129 - Well Conditions review

Ray Dienzo

Mon 6/6/2016 1:40 PM

To: Tim Tomlinson <ttomlinson@co.slo.ca.us>;

Hi Tim,

After investigating more on this project, we will not require any these wells to be included in our Well Monitoring Program.

Since the purpose of these well are to capture and treat the leachate from the landfill, any monitoring required for this project will be coordinated with the Regional Board.

Regards,  
Ray

Ray Dienzo, P.E.

Technical Unit Supervisor

Water Resources Division

County of San Luis Obispo Public Works

976 Osos St, Room 206, San Luis Obispo, CA 93408

phone: 805-788-2110

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**From:** Tim Tomlinson

**Sent:** Wednesday, June 1, 2016 4:36 PM

**To:** Ray Dienzo

**Subject:** Re: Coastal Well Permit MUP

201R11N006

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**From:** Ray Dienzo

**Sent:** Wednesday, June 1, 2016 4:23 PM

**To:** Tim Tomlinson

**Subject:** Re: Coastal Well Permit MUP





SAN LUIS OBISPO COUNTY

## DEPARTMENT OF PLANNING AND BUILDING

Promoting the wise use of land - Helping to build great communities

THIS IS A NEW PROJECT REFERRAL

RECEIVED

DATE: 5/25/2016

TO:

ENV. HEALTH

MAY 26 2016

FROM: Kate Shea (805-781-4163 or kshea@co.slo.ca.us)  
Coastal Team / Development Review

Environmental Health

**PROJECT DESCRIPTION:** DRC2015-00129 PICCUTA – Proposed minor use permit to install 10 new groundwater extraction wells and approximately 300 SF treatment facility. Project location is 2275 Turri Road, Los Osos. APN: 067-011-047

Return this letter with your comments attached no later than 14 days from receipt of this referral. CACs please respond within 60 days. Thank you.

PART 1 - IS THE ATTACHED INFORMATION ADEQUATE TO COMPLETE YOUR REVIEW?

- ☐ YES (Please go on to PART II.)  
☐ NO (Call me ASAP to discuss what else you need. We have only 10 days in which we must obtain comments from outside agencies.)

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- ☐ YES (Please describe impacts, along with recommended mitigation measures to reduce the impacts to less-than-significant levels, and attach to this letter.)  
☐ NO (Please go on to PART III.)

PART III - INDICATE YOUR RECOMMENDATION FOR FINAL ACTION.

Please attach any conditions of approval you recommend to be incorporated into the project's approval, or state reasons for recommending denial.

IF YOU HAVE "NO COMMENT," PLEASE SO INDICATE, OR CALL.

Obtain proper permits from this office for the drilling of the extraction wells. Should the new treatment facility utilize or produce hazardous above

Date

7/1/16

Name

[Signature]

Phone

781-5544

threshold qty. - contact this office.





SAN LUIS OBISPO COUNTY  
**DEPARTMENT OF PUBLIC WORKS**

Wade Horton, Director

County Government Center, Room 206 • San Luis Obispo CA 93408 • (805) 781-5252

Fax (805) 781-1229

email address: pwd@co.slo.ca.us



## **Memorandum**

**Date:** July 26, 2016

**To:** Kate Shea, Environmental Resource Specialist

**From:** Keith Miller and Katie Drexhage – Environmental Resources Specialists

**Subject:** Los Osos Landfill Groundwater Treatment Project – Project alternatives to address ESHA setbacks

The biological assessment included in the Draft Initial Study concludes that the proposed project would have less than significant impacts to ESHA. Nevertheless, the proposed treatment facility and wells would be within the 100-foot setback required by the County's Coastal Zone Land Use Ordinance for Riparian Vegetation. The following discussion, describes why alternative locations are not technically feasible and/or would result in similar or greater impacts to ESHA.

The well locations were chosen because they are both at the edge of the known limit of refuse, located downgradient from the landfill, and located between the landfill and Warden Creek. The distribution of the wells, along with their elevation is proposed to be most effective given the local topography and hydrologic conditions. Further, the wells are located between an existing access road and the 2:1 (or steeper) landfill slopes adjacent to other existing monitoring wells. The access road separates the wells from the edge of riparian vegetation to the south. No other well locations could feasibly attain the project water quality objectives. These constraints are shown in the attached figure.

The location of the treatment facility was originally guided by 4 factors, including:

1. locating it at approximately the same elevation or lower than the wells to minimize pumping requirements;
2. tying the facility into the existing flare station to take advantage of existing utility services and a compressor;
3. reducing ground disturbance by utilizing existing access roads and paved staging areas; and
4. locating it outside of the limits of refuse to avoid disturbing the landfill cap.

The existing flare station is enclosed in an approximately 8-foot-tall concrete block wall. Using the existing paved area in front of the flare station for the treatment facility would meet the four criteria above and would avoid the loss of any riparian or upland vegetation. The treatment facility would be located approximately 45 feet from the edge of riparian vegetation and would use the existing flare station as a hard buffer between the flare station. In other words, there is no line of sight between the riparian vegetation and the treatment facility. Further, the project will produce minimal noise and would only require lighting at night for rare emergency work. No impacts to the riparian vegetation would occur from operations or maintenance of the facility.

There are few alternate locations that would accommodate a 100-foot buffer from riparian vegetation, while avoiding the landfill finished slopes as well as the detention basins, and not



require intensive pumping. However, these alternate locations would require more grading than the proposed project due to the necessary access requirements. Additionally, these alternate locations would require utility extensions and would result in a greater loss of vegetation onsite. In addition, using an alternate site would result in the need to construct a larger facility as it would not be feasible to tie into the flare station compressor.

While the County has considered multiple locations for the facility, a combination of engineering and environmental constraints have resulted in the proposed treatment facility location. Alternative locations would result in larger project costs and more environmental disturbance (e.g., ground disturbance and vegetation removal). From a practical matter, the project elements must be located close to the riparian habitat onsite to monitor water quality from the landfill, prior to water entering Warden Creek. The proposed project will not significantly disrupt ESHA because measures to avoid unnecessary disturbance have been adopted through project design.



SAN LUIS OBISPO COUNTY  
**DEPARTMENT OF PUBLIC WORKS**

Wade Horton, Director

County Government Center, Room 206 • San Luis Obispo CA 93408 • (805) 781-5252

Fax (805) 781-1229

email address: [pwd@co.slo.ca.us](mailto:pwd@co.slo.ca.us)



## **Memorandum**

**Date:** July 26, 2016

**To:** Los Osos Groundwater Treatment Project (#320071) project file

**From:** Kate Ballantyne, Environmental Division Manager/Cultural Resources Specialist

**Subject:** Cultural resources survey results

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On February 25, 2016 I visited the Los Osos Landfill Groundwater Treatment Project (site) with Environmental Resource Specialist Keith Miller. Prior to the pedestrian survey cultural resources records of the Los Osos area were reviewed. The nearest known resources were located approximately 0.32 mile to the northeast, and 0.30 mile to the northwest.

I performed a pedestrian survey of the proposed area of disturbance plus an approximately 20-foot buffer area. No resources, or soils indicating the potential for resources, were identified during the survey. It was determined that the areas that would be disturbed by the project are not natural landforms, but areas that have been previously disturbed by historic and recent landfill activities, including excavation of the landfill, construction of access roads, construction of the flare station, "capping" of the landfill, as well as construction of the landfill gas collection system, and the monitoring wells.

No further cultural resources surveys or monitoring are required. In the unlikely event that cultural resources are discovered during construction, work shall cease until the nature and significance of the find are evaluated by a qualified archaeologist.



Reply | ▾ Delete Junk | ▾ ...



## RE: Los Osos Landfill DRC2015-00129 PICCUTA, Coastal E-Referral, Minor Use Permit, Los Osos

LR

Lodge, Ryan@Waterboards &lt;Ryan.Lodge@waterboards.ca.gov&gt;

Reply | ▾

8/17/2016

Kate B. Shea ▾

Inbox

Kate,

Thank you for providing us an opportunity to comment on the Los Osos Closed Landfill project to install ten groundwater extraction wells and a treatment system. We support the project and encourage the County to proceed with project implementation as soon as possible. The project is required as part of corrective actions for the closed landfill. Groundwater downgradient of the landfill is impacted with volatile organic compounds (VOCs). The current Waste Discharge Requirement Order No. R3-2007-0023 prohibits groundwater impacts downgradient from the landfill. Cleanup or Abatement Order No. 95-66 issued to the County of San Luis Obispo by the Water Board requires cleanup of contaminated groundwater downgradient of the landfill. The proposed project is needed to remove VOCs from groundwater and should result in downgradient water quality improvement. Let me know if you have any questions or need any additional information.

Ryan Lodge, PE  
Water Resource Control Engineer  
Central Coast Water Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401  
Phone: (805) 549-3506  
Fax: (805) 543-0397

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**From:** Kate B. Shea [mailto:kbshea@co.slo.ca.us]  
**Sent:** Monday, August 15, 2016 10:31 AM  
**To:** Lodge, Ryan@Waterboards  
**Subject:** Los Osos Landfill DRC2015-00129 PICCUTA, Coastal E-Referral, Minor Use Permit, Los Osos

Hi Ryan:

Good to talk with you last Friday in regards to the Los Osos Landfill project.  
Attached are maps, and a direct link to the referral package is embedded in the email below.  
Please let me know if you would like to provide comments.

**Kate Shea**

Environmental Resource Specialist  
Department of Planning and Building  
Office: 805-781-4097